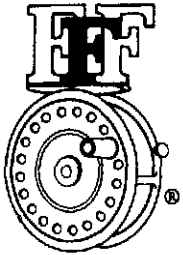


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**FEDERATION OF FLY FISHERS™**  
*Conserving • Restoring • Educating Through Fly Fishing*  
**Northern California Council**

September 23, 1999

CalFed Bay-Delta Program  
1416 Ninth Street, Suite 1155  
Sacramento, CA 95814

Attention of: Mr. Richard Breitenbach

Subject: Comments, Ecosystem Restoration Program Plan

Dear Mr. Breitenbach:

This is to expand on our public statements and the written materials separately submitted by Mr. Dan McDaniel, President, NCCFFF, and Mr. Rob Ferrogiaro, Conservation Vice-President. This submittal includes an introductory policy overview which is followed by separate specific comments related to the following components of your studies:

1. Environmental Document Deficiencies
2. Ecosystem Restoration Goals
3. Steelhead
4. Striped Bass
5. Watershed Program

We support the CALFED process as an essential method by which California may restore lost public trust assets while maximizing beneficial uses of its water resources. Our principal caveat is that appropriate and guaranteed water flows must be made available to assure we "optimize" our fish and wildlife resources, rather than merely "sustain" them. We agree with an approach which restores the "natural processes" which work normally in uncontrolled rivers and streams. However, from a hard headed business standpoint, this is not inconsistent with setting "optimum" numerical goals for species recovery. Such goals must be set where they are missing from the plan.

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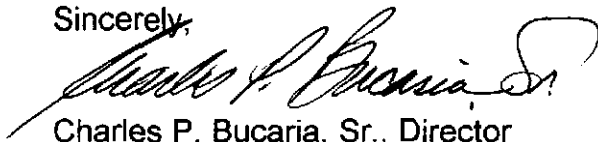
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Our specific ERPP EIS/EIR comments follow.

Sincerely,

A handwritten signature in dark ink, appearing to read "Charles P. Bucaria, Sr.", written in a cursive style.

Charles P. Bucaria, Sr., Director

cc: Governor Gray Davis  
Resources Agency Secretary Mary Nichols

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1. Currently inadequate or unstable supplies must be replaced with adequate supplies of high quality water.
2. Water temperatures must fall within the optimum range for steelhead in all of their life stages.

In order to achieve the goals noted above, additional temperature control devices may need to be added to existing reservoirs. However, getting more steelhead to extensive and diverse headwaters not used by Chinook salmon is the appropriate action if runs are to be optimized. This is necessary because of the year around temperature sensitivity of steelhead, and so that the two species don't compete for the same limited food supply. Access to smaller feeder streams for steelhead will limit the competition to the advantage of both species. As a part of the optimization process, experiments must be funded to determine the efficacy of steelhead restoration above major reservoirs.

We applaud removal of dams on Butte Creek. Action to implement the Battle Creek plan will potentially result in expanded high quality steelhead habitat. We support rapid action on this project. Dam removal on Clear Creek has similar potential. These creative approaches to solving the problem of where can restoration take place are commendable. Englebright dam on the Yuba River presents a different problem. The dam must go, or a fail-safe method of fish passage must be found. The price may include flood control works downstream, which we support, in concept. The costs will be high and the politics difficult. Nevertheless, this represents potentially the best single option for free-flowing river restoration in California. In no event should Yuba River steelhead restoration be minimized or eliminated. We strongly support CALFED action to make this restoration take place.

On a separate front, any plan for restoration of must include funds for experiments and feasibility studies related to steelhead passage around major dams and reservoirs. Both Shasta and Oroville are candidate reservoirs for such experiments.

#### 4. STRIPED BASS

The environmental documents contain inconsistent statements with respect to striped bass and the restoration of the striped bass fishery. The documents should be revised to consistently reflect (1) historical abundance as the restoration goal, (2) restoration without artificial reproduction (hatchery propagation and stocking), and (3) acknowledgment and mitigation of the human health effects of striped bass ingestion.

The environmental documents defer to the 1996 California Fish & Game Commission policy for restoration of the striped bass fishery (short-term abundance of 1 million bass exceeding 18-inches, long-term abundance of 3 million bass exceeding 18-inches). CalFed should recognize that this policy was formulated as a compromise regarding what was "achievable", given continued entrainment of striped bass by the Tracy and Clifton court pumping plants, continued depletion of habitat, and continued water quality problems. The restoration goal for striped bass should be historical abundance (approximately 7 to 17 million bass exceeding 18-inches). Any other goal will be arbitrary. Any lesser goal will fail to recognize the recreational importance of one of the Bay-Delta's top gamefish.

The environmental documents are inconsistent with respect to artificial spawning to support restoration of the striped bass fishery. Most of the inconsistencies appear within the Environmental Restoration Plan. In some parts of the documents artificial spawning is considered necessary to restore the fishery, in other parts of the documents artificial spawning is considered necessary for the short term, in still other parts of the documents artificial spawning is considered detrimental due to predation on priority species. The environmental documents should target restoration of the striped bass fishery without artificial spawning.

The environmental documents are inconsistent with respect to predation of striped bass on priority species. Most of the inconsistencies appear within the Environmental Restoration Plan. Some parts of the documents represent predation as a concern while other parts of the documents fail to mention predation concerns in relation to the striped bass fishery. Provided striped bass abundance is not out-of-balance with ecosystem capacity, striped bass predation on priority species will not be a significant concern. We have made numerous scientific inquiries and this is a universally-held opinion. To ensure striped bass abundance is in balance with ecosystem capacity, striped bass should be restored through natural propagation, not artificial spawning.

The environmental documents state that, because harvest rates are below 20%, harvest restrictions will not be an effective tool for striped bass recovery. This is not true. Because of striped bass fecundity, harvest restrictions, particularly for the larger females, will be an extremely effective tool for striped bass recovery. We believe that harvest restrictions represent the best way to position the striped bass fishery for recovery under CalFed's ecosystem restoration.

The environmental documents fail to note that significant historical striped bass spawning occurred in the main stem of the San Joaquin River, but that heavy diversions from the San

Joaquin and its tributaries, along with major flow changes caused by the Tracy and Clifton Court pumping plants, have decimated this natural spawning. The natural reproduction of striped bass within the San Joaquin system is currently limited by the ability of this system to produce consistent spring flows that will keep fertilized eggs in suspension for at least 72 hours. This is one more important consideration for the management of water in the south Delta.

Striped bass are currently recognized by the regulatory agencies as unhealthy to eat except in very limited quantities. The latest recommendations by the California Office of Health Hazard Assessment, for normal healthy adults, consist of 2 meals or less per month, with no fish larger than 35 inches. The recommendations are stricter for pregnant women and children. Despite these warnings, the striped bass is one of the most widely-consumed fish from the Bay-Delta. The human health hazards from striped bass consumption represent a chemical hazard that, by and large, remains unacknowledged and unaddressed by CalFed. Moreover, no mitigation strategy is proposed. Mitigation strategies could include harvest restrictions, water quality and sediment quality improvements, and public education. The environmental documents should be revised to recognize and mitigate the human health problems of chemically-tainted striped bass.

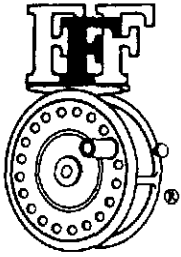


## 5. WATERSHED PROGRAM

We believe that the watershed program has great potential for contributing to the CALFED Bay/Delta solution. Restored watersheds and improved land use practices can improve the economies and quality of life in the upper watersheds, as well as improving California's water balance. Simple actions such as excluding cattle from river and stream riparia areas will improve water quality, reduce sediment loads, lower water temperatures for cold water species, create equivalent storage in rewetted meadows, reduce downstream flooding and improve the time value of water flows.

All water quality and quantity benefits accrued through the watershed program should be used for environmental improvement purposes throughout the system. The operative rationale is that the watershed program is funded using public revenues. Thus, the water quality and quantity benefits should flow to public trust resources.

The Watershed Program Plan discusses the need for linkages with other CALFED program elements. However, it does not provide a workable methodology to interrelate successes in the watershed with a Bay/Delta solution. The Watershed Program plan must include a system to quantify potential improvements in stream flow, water quality, sediment transport, time value of water and flood potential reduction. These interrelated components can then be modeled and incorporated into California's water budget. Reservoir operating criteria can then be modified to reflect the reality of restored watersheds, as measured by the CALFED monitoring and assessment program. This effort to link watersheds to the Bay/Delta solution should be iterative and long term.



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On a separate front, any plan for restoration of must include funds for experiments and feasibility studies related to steelhead passage around major dams and reservoirs. Both Shasta and Oroville are candidate reservoirs for such experiments.

#### 4. STRIPED BASS

The environmental documents contain inconsistent statements with respect to striped bass and the restoration of the striped bass fishery. The documents should be revised to consistently reflect (1) historical abundance as the restoration goal, (2) restoration without artificial reproduction (hatchery propagation and stocking), and (3) acknowledgment and mitigation of the human health effects of striped bass ingestion.

The environmental documents defer to the 1996 California Fish & Game Commission policy for restoration of the striped bass fishery (short-term abundance of 1 million bass exceeding 18-inches, long-term abundance of 3 million bass exceeding 18-inches). CalFed should recognize that this policy was formulated as a compromise regarding what was "achievable", given continued entrainment of striped bass by the Tracy and Clifton court pumping plants, continued depletion of habitat, and continued water quality problems. The restoration goal for striped bass should be historical abundance (approximately 7 to 17 million bass exceeding 18-inches). Any other goal will be arbitrary. Any lesser goal will fail to recognize the recreational importance of one of the Bay-Delta's top gamefish.

The environmental documents are inconsistent with respect to artificial spawning to support restoration of the striped bass fishery. Most of the inconsistencies appear within the Environmental Restoration Plan. In some parts of the documents artificial spawning is considered necessary to restore the fishery, in other parts of the documents artificial spawning is considered necessary for the short term, in still other parts of the documents artificial spawning is considered detrimental due to predation on priority species. The environmental documents should target restoration of the striped bass fishery without artificial spawning.

The environmental documents are inconsistent with respect to predation of striped bass on priority species. Most of the inconsistencies appear within the Environmental Restoration Plan. Some parts of the documents represent predation as a concern while other parts of the documents fail to mention predation concerns in relation to the striped bass fishery. Provided striped bass abundance is not out-of-balance with ecosystem capacity, striped bass predation on priority species will not be a significant concern. We have made numerous scientific inquiries and this is a universally-held opinion. To ensure striped bass abundance is in balance with ecosystem capacity, striped bass should be restored through natural propagation, not artificial spawning.

The environmental documents state that, because harvest rates are below 20%, harvest restrictions will not be an effective tool for striped bass recovery. This is not true. Because of striped bass fecundity, harvest restrictions, particularly for the larger females, will be an extremely effective tool for striped bass recovery. We believe that harvest restrictions represent the best way to position the striped bass fishery for recovery under CalFed's ecosystem restoration.

The environmental documents fail to note that significant historical striped bass spawning occurred in the main stem of the San Joaquin River, but that heavy diversions from the San



Joaquin and its tributaries, along with major flow changes caused by the Tracy and Clifton Court pumping plants, have decimated this natural spawning. The natural reproduction of striped bass within the San Joaquin system is currently limited by the ability of this system to produce consistent spring flows that will keep fertilized eggs in suspension for at least 72 hours. This is one more important consideration for the management of water in the south Delta.

Striped bass are currently recognized by the regulatory agencies as unhealthy to eat except in very limited quantities. The latest recommendations by the California Office of Health Hazard Assessment, for normal healthy adults, consist of 2 meals or less per month, with no fish larger than 35 inches. The recommendations are stricter for pregnant women and children. Despite these warnings, the striped bass is one of the most widely-consumed fish from the Bay-Delta. The human health hazards from striped bass consumption represent a chemical hazard that, by and large, remains unacknowledged and unaddressed by CalFed. Moreover, no mitigation strategy is proposed. Mitigation strategies could include harvest restrictions, water quality and sediment quality improvements, and public education. The environmental documents should be revised to recognize and mitigate the human health problems of chemically-tainted striped bass.

## 5. WATERSHED PROGRAM

We believe that the watershed program has great potential for contributing to the CALFED Bay/Delta solution. Restored watersheds and improved land use practices can improve the economies and quality of life in the upper watersheds, as well as improving California's water balance. Simple actions such as excluding cattle from river and stream riparia areas will improve water quality, reduce sediment loads, lower water temperatures for cold water species, create equivalent storage in rewetted meadows, reduce downstream flooding and improve the time value of water flows.

All water quality and quantity benefits accrued through the watershed program should be used for environmental improvement purposes throughout the system. The operative rationale is that the watershed program is funded using public revenues. Thus, the water quality and quantity benefits should flow to public trust resources.

The Watershed Program Plan discusses the need for linkages with other CALFED program elements. However, it does not provide a workable methodology to interrelate successes in the watershed with a Bay/Delta solution. The Watershed Program plan must include a system to quantify potential improvements in stream flow, water quality, sediment transport, time value of water and flood potential reduction. These interrelated components can then be modeled and incorporated into California's water budget. Reservoir operating criteria can then be modified to reflect the reality of restored watersheds, as measured by the CALFED monitoring and assessment program. This effort to link watersheds to the Bay/Delta solution should be iterative and long term.